

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ALABAMA  
NORTHWESTERN DIVISION**

**RICHARD S. BYRD,**

**Plaintiff,**

**v.**

**FORD MOTOR COMPANY,**

**Defendant.**

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**Case No. 3:19-cv-398-CLS**

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**MOTION LEAVE TO FILE AMENDED COMPLAINT**

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**COMES NOW** the Plaintiff, pursuant to Rule 15(a) of the *Federal Rules of Civil Procedure* and moves this Honorable Court for leave to file his proposed First Amended Complaint, attached hereto as Exhibit One.

Plaintiff further submits that proposed First Amended Complaint which, if allowed, may alleviate the need for a further curative amendment. Therefore, in the event the Court finds that the existing factual allegations are deficient, the proposed amendment would cure the said deficiencies.

Respectfully submitted this 4<sup>th</sup> day of September 2019.

/s/Earl P. Underwood, Jr. \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that on 4<sup>th</sup> day of September 2019 a copy of the foregoing pleading has been electronically served through the Court's CM/ECF filing system to all counsel of record.

/S/Earl P. Underwood, Jr.

EARL P. UNDERWOOD, JR. (UND008)